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REQUEST FOR ENTRY OF CONSENT DECREE

TO THE CLERK OF THE COURT, ANY INTERESTED PARTIES, AND THEIR ATTORNEYS OF RECORD:

PLEASE TAKE NOTICE that the 45-day agency-review period has concluded as of November 1, 2025. *See* 33 U.S.C. § 1365(c) (requiring that "[n]o consent judgment shall be entered in an action in which the United States is not a party prior to 45-days following the receipt of a copy of the proposed consent judgment by the Attorney General and the Administrator"); and, 40 C.F.R. § 135.5 (requiring the parties to provide notice to the court of the 45-day agency review period under 33 U.S.C. § 1365(c)). No objection to the proposed consent decree has been made by either the Attorney General or the Administrator.

**NOW THEREFORE**, Plaintiff Los Angeles Waterkeeper respectfully requests that the Court execute and enter the proposed consent decree, attached hereto as **Exhibit 1**, and dismiss the claims with prejudice, except to the extent provided for in the proposed consent decree to interpret, modify or enforce the proposed consent decree.

Date: November 3, 2025 LAW OFFICE OF WILLIAM CARLON

William N. Carlon Attorneys for Plaintiff Los Angeles Waterkeeper

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